Case 1:20-cr-00005-GBD Document 22 Filed 04/28/21 Page 1 of 1

SCOTT B. TULMAN & ASSOCIATES. P.

THE HELMSLEY BUILDING
230 PARK AVENUE
18¹⁸ FLOOR
NEW YORK, NEW YORK 10169
(212) 867-3600
TELECOPIER: (212) 867-1914

WWW.TULMANLAW.COM

ENT SOS 6 S AGK

SO ORDERED

The sentencing scheduled for

May 12, 2021 at 10:00 a.m. is adjourned until June 2, 2021 at 10:00 a.m.

April 28, 2021

BY ECF

The Honorable George B. Daniels
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re:

United States v. Kevin Haynes

20 Cr 00005 (GBD)

Dear Judge Daniels:

I am counsel for Defendant Kevin Haynes. Mr. Haynes is scheduled to be sentenced on May 12, 2021, at 10:00 a.m. I write to respectfully request that the sentencing in this matter be adjourned two weeks, and that the dates for sentencing submissions be adjusted to conform with the new sentencing date.

The short adjournment is sought for three reasons. First, Mr. Haynes has been recently moved and I have not had a chance to review my sentencing submission with him, which is due today. Second, I require some additional materials relevant to sentencing that I have not obtained. Third, I have sent a draft of my submission to the Government and wish to discuss it with them in an effort to avoid any factual/Fatico issues if possible. I am generally available the week beginning May 24, 2021, except for May 26, 2021, at noon. The following week. I am generally available except for June 1, 2021 during the afternoon.

The Government consents to the relief sought.

Respectfully submitted,

ScotDB. Tulman

SBT:ss

cc: Sarah Mortazavi, Esq., AUSA